

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

**OSCAR SANCHEZ, TESMOND
McDONALD, MARCELO PEREZ,
KEITH BAKER, PAUL WRIGHT, and
OLIVIA WASHINGTON, *on their own and
on behalf of a class of similarly situated
persons;***

Civil Action No. 3:20-cv-00832

*Petitioners/Plaintiffs,
v.*

**DALLAS COUNTY SHERIFF MARIAN
BROWN, *in her official capacity;* and
DALLAS COUNTY, TEXAS;**

Respondents/Defendants.

DETAINEE PLAINTIFFS' DEPOSITION DESIGNATIONS

Detainee Plaintiffs serve the following deposition page/line designations that may be submitted to the Court and used at trial. Detainee Plaintiffs reserve the right to amend these designations and/or introduce additional testimony for rebuttal, impeachment, or any other proper purpose. Detainee Plaintiffs specifically note that due to the forward-looking nature of the relief they are seeking, they expect to receive additional information and documents from County Jail Defendants and the Dallas County Hospital District before and during trial and therefore reserve the right to amend or supplement these designations in light of receiving the additional information and documents.

PATRICK JONES
DECEMBER 16, 2020

<u>PLAINTIFFS' DEPOSITION DESIGNATIONS</u>	<u>OBJECTIONS TO DESIGNATIONS</u>	<u>COUNTER- DESIGNATIONS</u>	<u>OBJECTIONS TO COUNTER- DESIGNATIONS</u>
29:10-19			
91:18-22			
104:15-24			
134:22-135:20			
146:12-18			
147:12-18			
150:6-16			
168:19-169:2			
171:9-172:16			
176:18-22			
177:19-180:1			
187:16-21			
200:12-202:21			

PATRICK JONES
MAY 27, 2021

<u>PLAINTIFFS' DEPOSITION DESIGNATIONS</u>	<u>OBJECTIONS TO DESIGNATIONS</u>	<u>COUNTER- DESIGNATIONS</u>	<u>OBJECTIONS TO COUNTER- DESIGNATIONS</u>
20:9-22			
27:20-28:3			
30:25-31:13			
35:12-19			
35:25-36:16			
62:17-63:14			

KIARA YARBOROUGH
DECEMBER 29, 2020

<u>PLAINTIFFS' DEPOSITION DESIGNATIONS</u>	<u>OBJECTIONS TO DESIGNATIONS</u>	<u>COUNTER- DESIGNATIONS</u>	<u>OBJECTIONS TO COUNTER- DESIGNATIONS</u>
4:6-15			
4:20-23			

<u>PLAINTIFFS' DEPOSITION DESIGNATIONS</u>	<u>OBJECTIONS TO DESIGNATIONS</u>	<u>COUNTER- DESIGNATIONS</u>	<u>OBJECTIONS TO COUNTER- DESIGNATIONS</u>
7:18-8:11			
12:9-14:1			
14:12-15:3			
15:21-24			
19:24-20:10			
23:18-25			
24:4-12			
28:4-29:20			
31:24-32:8			
32:16-33:15			
34:22-35:15			
36:25-37:7			
38:9-19			
43:15-44:10			
44:20-45:14			
45:21-46:10			
48:20-49:12			
52:3-11			
53:11-54:2			
54:20-55:2			
57:9-58:11			
64:20-65:22			
67:11-17			
71:1-17			
77:5-14			
78:13-25			
79:8-13			
80:8-81:18			
88:4-89:1			
93:25-94:7			

DR. HOMER VENTERS
May 25, 2021

<u>PLAINTIFFS' DEPOSITION DESIGNATIONS</u>	<u>OBJECTIONS TO DESIGNATIONS</u>	<u>COUNTER- DESIGNATIONS</u>	<u>OBJECTIONS TO COUNTER- DESIGNATIONS</u>
5:10-6:18			
76:13-96:1			
97:8-130:1			
141:9-148:21			

IDEARE BAILEY
DECEMBER 4, 2020

<u>PLAINTIFFS' DEPOSITION DESIGNATIONS</u>	<u>OBJECTIONS TO DESIGNATIONS</u>	<u>COUNTER- DESIGNATIONS</u>	<u>OBJECTIONS TO COUNTER- DESIGNATIONS</u>
36.13-37:10			
38:18-24			
39:2-11			
40:3-15			
56:11-58:16			
39:12-24			

OSCAR SANCHEZ
MAY 13, 2021

<u>PLAINTIFFS' DEPOSITION DESIGNATIONS</u>	<u>OBJECTIONS TO DESIGNATIONS</u>	<u>COUNTER- DESIGNATIONS</u>	<u>OBJECTIONS TO COUNTER- DESIGNATIONS</u>
12:12-13:6			
20:10-22:2			
26.9-23			
27:17-29:5			
30:20-34:9			
37:11-21			

OLIVIA WASHINGTON
MAY 13, 2021

<u>PLAINTIFFS' DEPOSITION DESIGNATIONS</u>	<u>OBJECTIONS TO DESIGNATIONS</u>	<u>COUNTER- DESIGNATIONS</u>	<u>OBJECTIONS TO COUNTER- DESIGNATIONS</u>
8:19-10:3			
10:9-11:6			
12:17-24:15			
25:2-27:18			
28:12-35:3			
35:12-15			
35:22-23			
37:10-12			
37:20-38:4			
39:4-20			
40:8-41:6			

KEITH BAKER
DECEMBER 29, 2020

<u>PLAINTIFFS' DEPOSITION DESIGNATIONS</u>	<u>OBJECTIONS TO DESIGNATIONS</u>	<u>COUNTER- DESIGNATIONS</u>	<u>OBJECTIONS TO COUNTER- DESIGNATIONS</u>
12:18-15:24			
32:17-21			

Dated: July 13, 2021

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served via the Court's CM/ECG system on all counsel registered with that system, and via email, on July 13, 2021.

/s/ Barry Barnett
Barry Barnett